

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE NATIONAL PRESCRIPTION	:	MDL No. 2804
OPIATE LITIGATION	:	CASE NO. 17-MD-2804 (DAP)
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SUPPLEMENTAL EXPERT REPORT OF CRAIG J. MCCANN, PH.D., CFA
April 3, 2019

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I. Qualifications and Remuneration

1. On March 25, 2019, I filed an Expert Report (the “McCann Report”) in this matter. My Qualifications and Remuneration are contained in the McCann Report §1 and are unchanged.

II. Materials Reviewed

2. The list of Materials Reviewed in preparing the McCann Report are contained in the McCann Report §2 and are unchanged.

III. Assignment

3. The McCann Report contained 24 Figures and 46 Tables in the body and 3,800 pages of additional Figures and Tables and hundreds of thousands of lines of data in Appendices.

4. I have been asked to file this report “McCann Supplemental Expert Report” to supplement the body of the McCann Report with five (5) Tables which present data used in the Figures and Tables in the McCann Report in a slightly different format and which summarize electronic data attached to the McCann Report. I was also asked to supplement the McCann Report Appendices with 90 pages of additional Figures and Tables which I understand may have been used in depositions.

5. These supplemental Figures and Tables were overlooked in the preparation of the McCann Report, are entirely consistent with the McCann Report and do not in any way alter the conclusions I reached therein.

IV. Supplemental Tables in the Body of the McCann Report

6. The following paragraph and Table A should be read as if inserted after Table 25 on page 60 of the McCann Report.

7. Table A reports Total MME and % of Total MME in transactions flagged in Cuyahoga and Summit Counties using the Trailing Six-Month Maximum Threshold summarized in Table 24 and Table 25.

Table A Trailing Six-Month Maximum Threshold Flagged Transactions, Cuyahoga and Summit Counties, Total MME and % MME



8. The following paragraph and Table B should be read as if inserted after Table 27 on page 64 of the McCann Report.

9. Table B reports Total MME and % of Total MME in transactions flagged in Cuyahoga and Summit Counties by the Twice Trailing Twelve-Month Average Pharmacy Dosage Units Threshold summarized in Table 26 and Table 27.

Table B Twice Trailing Twelve-Month Average Pharmacy Dosage Units Flagged Transactions, Cuyahoga and Summit Counties, Total MME and % MME



10. The following paragraph and Table C should be read as if inserted after Table 29 on page 68 of the McCann Report.

11. Table C reports Total MME and % of Total MME in transactions flagged in Cuyahoga and Summit Counties by the Three Times Trailing Twelve-Month Average Pharmacy Dosage Units Threshold summarized in Table 28 and Table 29.

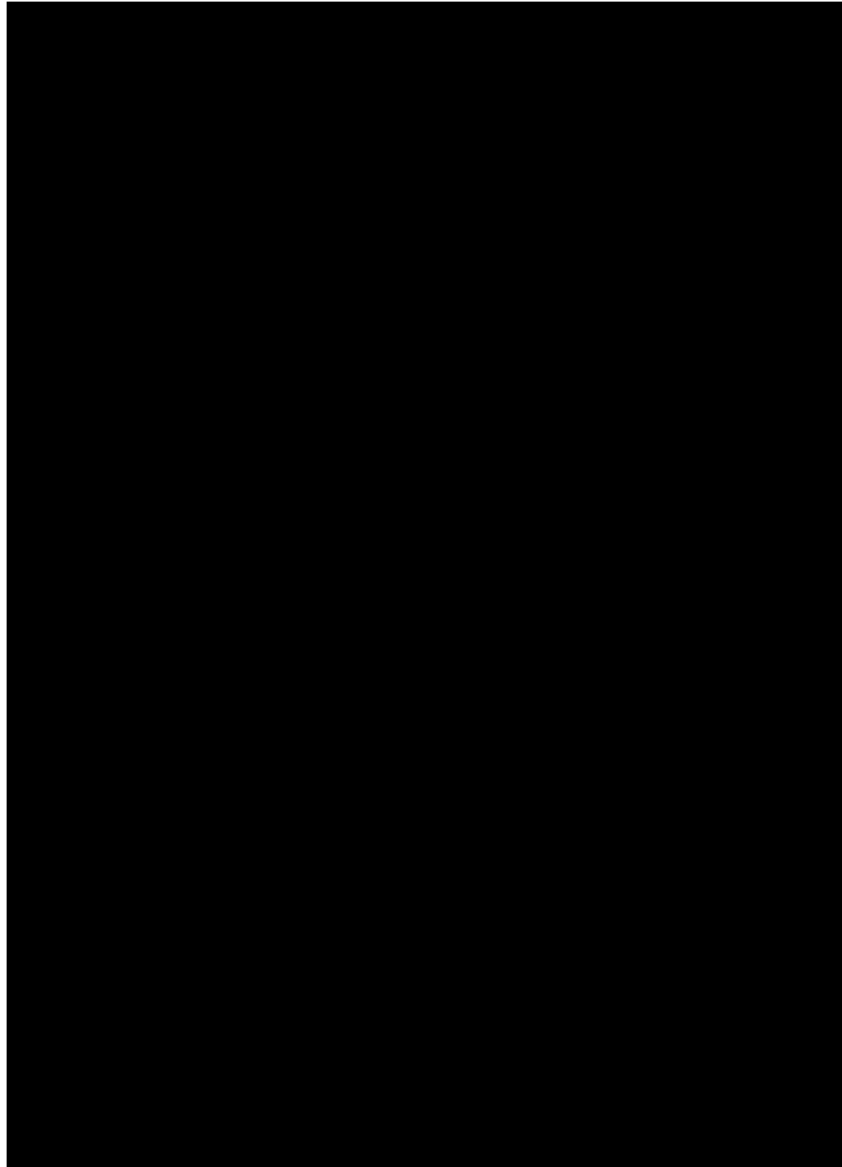
Table C Three Times Trailing Twelve-Month Average Pharmacy Dosage Units Flagged Transactions, Cuyahoga and Summit Counties, Total MME and % MME



12. The following paragraph and Table D should be read as if inserted after Table 31 on page 72 of the McCann Report.

13. Table D reports Total MME and % of Total MME in transactions flagged in Cuyahoga and Summit Counties by the Maximum 8,000 Dosage Units Monthly Threshold summarized in Table 30 and Table 31.

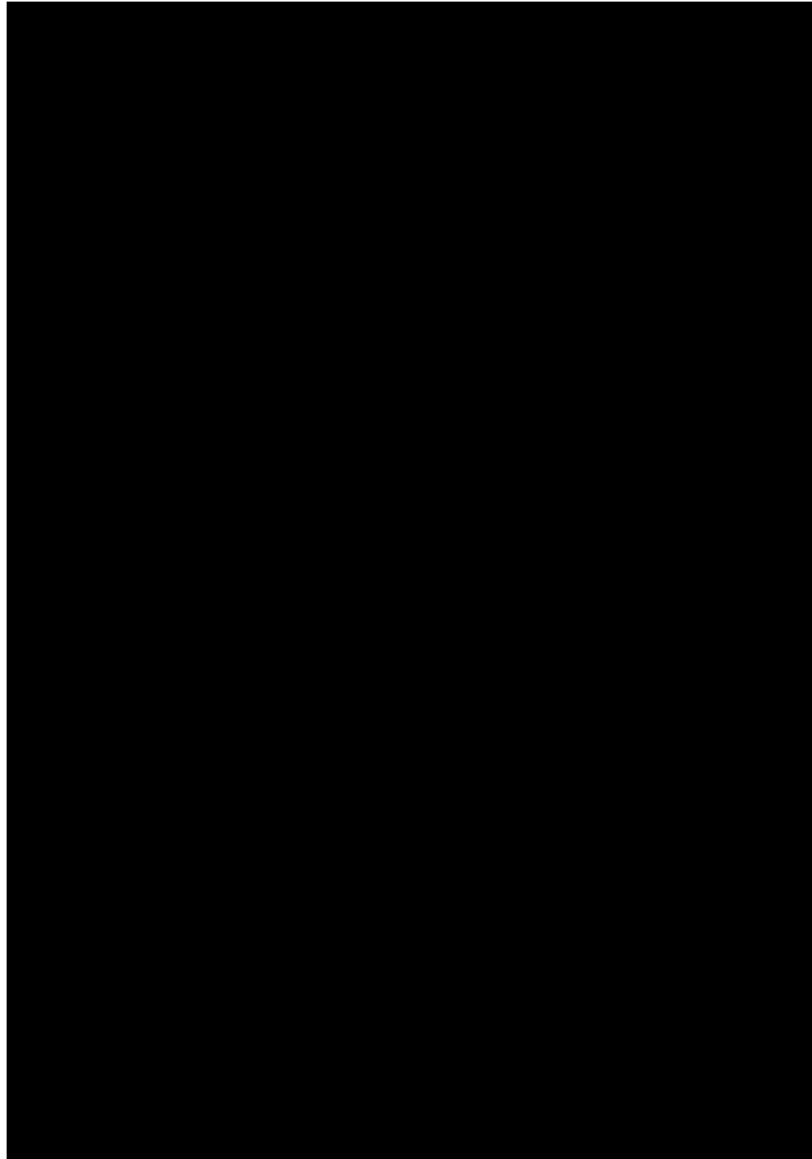
Table D Maximum 8,000 Dosage Units Monthly Flagged Transactions, Cuyahoga and Summit Counties, Total MME and % MME



14. The following paragraph and Table E should be read as if inserted after Table 33 on page 76 of the McCann Report.

15. Table E reports Total MME and % of Total MME in transactions flagged in Cuyahoga and Summit Counties by the Maximum Daily Dosage Units Threshold summarized in Table 32 and Table 33.

Table E Maximum Daily Dosage Units Flagged Transactions, Cuyahoga and Summit Counties, Total MME and % MME



V. Figures and Tables Used in Depositions

16. I previously created Figures and Tables which were used in depositions. While they were not necessary for the conclusions I reached in the McCann Report, I attach them herewith and acknowledge them as my work product or have otherwise determined they are fair and accurate representations of what they purport to illustrate and that they are reliable.

A. Cardinal Health

17. I was provided twenty three pages of Figures and Tables attached hereto as Appendix A which purport to provide information regarding the amounts of certain opioids shipped by Cardinal Health to customers located in various geographic areas.

B. Discount Drug Mart

18. I was provided two pages of Figures attached hereto as Appendix B which purport to illustrate the number of dosage units shipped by Discount Drug Mart to pharmacies BD2308155 and BD0995095.

C. HBC/Giant Eagle

19. I was provided forty seven pages of Figures and Tables, which included seven Pharmacy Reports for Giant Eagle pharmacies #4031, #4124, #4029, #4030, #4036, #6376, and #5878 and eight additional Tables which purport to provide information regarding the amounts of certain opioids shipped either by HBC or other Distributors to Giant Eagle pharmacies located in various geographic areas. These Reports and Tables are attached in Appendix C.

D. McKesson

20. I was provided the two pages of Figures attached hereto as Appendix D which purport to illustrate the total dosage units of opioids shipped by McKesson to a) the United States; and b) to Ohio.

E. Walgreens

21. I was provided twelve pages of Figures and Tables that consisted of the three Pharmacy Reports for Walgreens pharmacies BW4673554, BW4147307, and BW6704185 attached hereto as Appendix E, which purport to provide historical information regarding shipments of opioids to those pharmacies.

VI. Flow of Opioids Figures

22. I created Figures illustrating the flow of oxycodone and hydrocodone through Distributors to Pharmacies in Cuyahoga County and Summit County. These Figures were inadvertently excluded from the McCann Report and are attached herewith as Appendix F. The major Labelers are arrayed on the left of each Figure, Distributors in the middle and Dispensers on the right. The Figures give market shares among Labelers to Distributors, among Distributors to Dispensers and among Dispensers.

VII. Conclusion

23. I file this brief supplement to report five (5) Tables which were inadvertently excluded from the body of the McCann Report and 90 pages of Figures and Tables which were inadvertently excluded from the Appendices of the McCann Report filed last week.

24. These supplemental Figures and Tables are entirely consistent with the Figures, Tables and data included in the McCann Report and do not in any way alter the conclusions I reached therein.

A handwritten signature in blue ink, reading "Craig J. McCann", is positioned above a horizontal line.

Craig J. McCann, Ph.D., CFA

